

William C. Rand, Esq. (WR-7685)
LAW OFFICE OF WILLIAM COUDERT RAND
501 Madison Avenue, 15th Floor
New York, New York 10017
Phone: (212) 286-1425; Fax: (646) 688-3078

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
ESTHEFANY HEREDIA, ESLAINI FERNANDEZ,	:
and ESTELA TAVERAS,	: ECF
Individually and on Behalf of All Other	: 17 Civ. 06219 (WHP)(HBP)
Persons Similarly Situated,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
AMERICARE, INC., MARTIN KLEINMAN and	:
JOHN DOES #1-10,	:
	:
Defendants.	:
-----X	

**PLAINTIFFS' NOTICE OF CROSS MOTION FOR SUMMARY JUDGMENT ON
LIABILITY ON OVERTIME CLAIMS**

PLEASE TAKE NOTICE that, upon this Notice of Motion, the attached Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment and in Support of Plaintiffs' Cross Motion for Summary Judgment, Plaintiff's Statement of Material Facts pursuant to Local Rule 56.1, the Declarations of Plaintiffs ESTHEFANY HEREDIA, ESLAINI FERNANDEZ ("Plaintiffs"), and ESTELA TAVERAS and WILLIAM C. RAND, ESQ., and the exhibits attached thereto filed concurrently herewith, all of the pleadings, files, and records in this proceeding, Plaintiffs will and hereby do move this Court, at the United States Courthouse, Daniel Patrick Moynihan Building, 500 Pearl Street, Room 1920, New York, NY 10007 before the Honorable Robert W. Lehrberger, U.S.M.J., in accordance with the Scheduling Order of the Court, or as soon thereafter as counsel may be heard, for an Order granting summary judgment on liability on

Plaintiffs' unpaid overtime claims in favor of Plaintiffs and denying Defendants motion for summary judgment, and such other and further relief as requested and as the Court deems just and proper in the above-captioned case, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

Dated: New York, New York
February 27, 2020

LAW OFFICE OF WILLIAM COUDERT RAND

S/William C. Rand

William Coudert Rand, Esq. (WR-7685)
Attorney for Plaintiff, Individually,
and on Behalf of All Other Persons Similarly Situated
501 Fifth Avenue, 15th Floor
New York, New York 10017
Tel: (212) 286-1425